

ESTTA Tracking number: **ESTTA319280**

Filing date: **11/30/2009**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91192365
Party	Defendant Whitney, Laurel, Almakias, Mordechai
Correspondence Address	JODY H. DRAKE SUGHRUE MION, PLLC 2100 PENNSYLVANIA AVENUE, NW WASHINGTON, DC 20037-3212  tm@sughrue.com
Submission	Answer
Filer's Name	Leigh Ann Lindquist
Filer's e-mail	kdaniels@sughrue.com, tm@sughrue.com, llindquist@sughrue.com, jdrake@sughrue.com
Signature	/Leigh Ann Lindquist/
Date	11/30/2009
Attachments	SEXXX Answer.pdf ( 3 pages )(76678 bytes )

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

Chatam International Incorporated,

Opposer,

v.

Laurel Whitney and Mordechai Almakias,

Applicants.

Opposition No.: 91/192,365

**APPLICANTS' ANSWER TO NOTICE OF OPPOSITION**

Applicants, by their attorney, hereby answer the allegations set forth in the Notice of Opposition as follows:

1. Applicants have insufficient knowledge or information upon which to form a belief as to truth of the allegations set forth in Numbered Paragraph 1 of the Notice of Opposition and, therefore, Applicants deny said allegations.
2. Applicants have insufficient knowledge or information upon which to form a belief as to truth of the allegations set forth in Numbered Paragraph 2 of the Notice of Opposition and, therefore, Applicants deny said allegations.
3. Applicants deny the allegations set forth in Numbered Paragraph 3 of the Notice of Opposition.
4. Applicants have insufficient knowledge or information upon which to form a belief as to truth of the allegations set forth in Numbered Paragraph 4 of the Notice of Opposition and, therefore, Applicants deny said allegations.

5. Applicants deny the allegations set forth in Numbered Paragraph 5 of the Notice of Opposition.

6. Applicants deny the allegations set forth in Numbered Paragraph 6 of the Notice of Opposition.

7. Applicants deny the allegations set forth in Numbered Paragraph 7 of the Notice of Opposition.

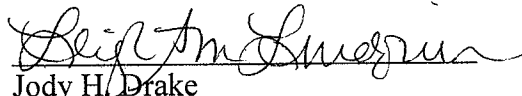
8. Applicants admit that if its mark in application Serial No. 77/516,519 matured into registration, the registration would serve as Applicants' prima facie exclusive right to use the mark in connection with the goods recited in the registration. Applicants deny the remaining allegations set forth in Numbered Paragraph 8 of the Notice of Opposition.

WHEREFORE, Applicants pray that the opposition be dismissed with prejudice.

Respectfully submitted,

Laurel Whitney and Mordechai Almakias

By:



Jody H. Drake

Leigh Ann Lindquist

Attorney for Applicants

SUGHRUE MION, PLLC

2100 Pennsylvania Avenue, N.W.

Washington, DC 20037-3202

Telephone: (202) 293-7060

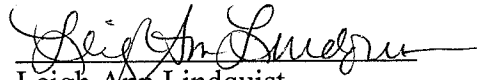
Facsimile: (202) 293-7860

Date: November 30, 2009

**CERTIFICATE OF SERVICE**

I, Leigh Ann Lindquist, Esq., hereby certify that on this 30th of November, 2009, a true and correct copy of the foregoing **APPLICANT'S ANSWER TO NOTICE OF OPPOSITION** was sent via First Class Mail, postage prepaid to:

Paul Lewis  
2633 Trenton Avenue  
Philadelphia, PA 19125  
Attorney for Opposer

  
Leigh Ann Lindquist